

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE WAVE STUDIO, LLC,

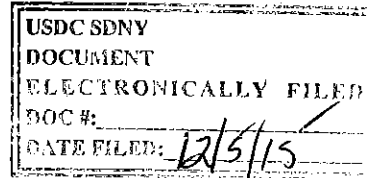
Plaintiff,

v.

AMADEUS NORTH AMERICA, INC. et al.,

Defendants.

Civil Action No.: 7:15-cv-06995-CS



**STIPULATION AND PROPOSED ORDER TO CONSOLIDATE CASES AND TO
STAY LITIGATION**

Plaintiff, The Wave Studio, LLC ("Wave"), and Defendants, Amadeus North America, Inc., Cathay Pacific Airways Ltd., and priceline.com LLC (collectively, the "Stipulating Defendants"), by and through their counsel of record, submit the following Stipulation and Proposed Order:

WHEREAS, on December 31, 2013, Wave filed a Complaint against General Hotel Management ("GHM") and others in an action captioned *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*, No. 7:13-cv-09239-CS-PED (the "GHM Litigation"), alleging that defendants infringed Wave's copyrights in certain photographs;

WHEREAS, on July 2, 2014, upon agreement of Wave and defendant GHM, the Court stayed proceedings in the GHM Litigation as to all parties except Wave and GHM, *see* GHM Action, No. 7:13-cv-09239-CS-PED, Dkt. No. 67;

WHEREAS, on March 24, 2015, Wave filed a Complaint against the Stipulating Defendants in the United States District Court for the Northern District of California in Case No. 3:15-cv-01364 (the "California Action"), alleging the Stipulating Defendants had infringed the same copyrights to certain photographs as those at issue in the GHM Litigation;

WHEREAS, on September 4, 2015, pursuant to a stipulation between Wave and the Stipulating Defendants, the United States District Court for the Northern District of California transferred the California Action to this Court;

WHEREAS, on September 8, 2015, the Court ordered that each active case filed by Plaintiff in this Court, except for this action, be consolidated with the GHM Litigation, and stayed with respect to each defendant except GHM;

WHEREAS, on October 7, 2015, this Court accepted this action as related to the GHM Litigation;

WHEREAS, Wave and the Stipulating Defendants agree this action and the GHM Litigation should be consolidated;

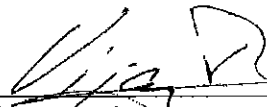
WHEREAS, Wave and the Stipulating Defendants agree to have the current stay in the GHM Litigation applied to this action under the same terms; and

IT IS HEREBY STIPULATED AND AGREED, by and among Wave and the Stipulating Defendants in the above-captioned action, through their undersigned counsel, that:

1. This action, Civil Action No. 7:15-cv-06995-CS, shall be consolidated with the GHM Litigation, No. 7:13-cv-09239-CS-PED; and
2. The consolidated action shall be stayed as to the Defendants except GHM.

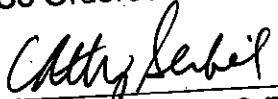
Dated: November 30, 2015

Respectfully submitted,



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So Ordered.



Cathy Seibel, U.S.D.J.

Dated: 12/4/15

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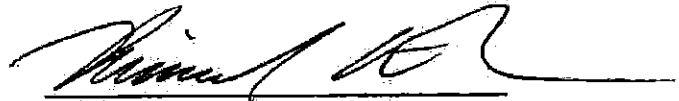
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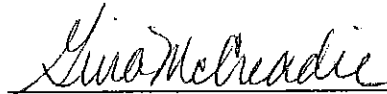
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